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MEB/HDM F. #2016R00695

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

October 21, 2019

## By Email

Michael Schachter, Esq. Randall W. Jackson, Esq. Casey Donnelly, Esq. Philip DiSanto, Esq. Willkie Farr & Gallagher LLP 787 Seventh Avenue New York, NY 10019-6099

> Re: United States v. Jean Boustani et al. Criminal Docket No. 18-681 (WFK)

## Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure consisting of materials with Bates DOJ0003086263 through DOJ0003086267. This disclosure supplements the government's earlier disclosures. The government again requests reciprocal discovery from the defendants.

- DOJ0003086263: material received October 18, 2019.
- DOJ0003086264-DOJ0003086265: One corrupted powerpoint file from repaired yesterday and a corresponding PDF.
- DOJ0002086266: material.
- DOJ0003086267: material.

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Also enclosed please find the government's production of supplemental 18 U.S.C. § 3500 material ("supplemental 3500 material"), and a list of the supplemental 3500 material, which the government has received since its last production of supplemental 3500 material on October 17, 2019. The supplemental 3500 material was sent by email. The government reserves the right to amend, supplement or alter the enclosed list, and to withdraw or supplement material produced pursuant to 18 U.S.C. § 3500 prior to trial

Very truly yours,

RICHARD P. DONOGHUE United States Attorney Eastern District of New York

By: /s/

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